MEMO-E-NPOORSED ocument 60 Filed 04/01/25 Page 1 of 1

Federal Defenders OF NEW YORK, INC.

Southern District 52 Duane Street, 10th Floor New York, NY 10007 Tel: (212) 417-8700 Fax: (212) 571-0392

Tamara Giwa
Executive Director

Jennifer L. Brown
Attorney-in-Charge

March 24, 2025

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC#:

DATE FILED: 4/1/25

Via ECF and Email

Honorable Andrew L. Carter, Jr. United States District Judge Southern District of New York 40 Foley Square New York, NY 10007

Re: <u>United States v. Robert Rumph</u>

23 Cr. 603 (ALC)

Dear Judge Carter,

I write to respectfully request that the Court adjourn the sentencing date in this case to the week of April 14 and to impose the following pre-sentencing deadlines. The parties have conferred and Assistant United States Attorney Will Kinder consents to the instant applications.

The government filed its letter regarding the guidelines enhancements on March 17, 2025. The defense seeks permission to file its response to that motion – along with its complete sentencing submission – on April 1, 2025. The government will file its sentencing submission regarding the section 3553(a) factors on April 8, 2025. If the Court has sufficient information from those submissions, the parties will be prepared to proceed with sentencing during the week of April 14. If the Court, instead, wishes to receive further briefing or testimony before sentencing, the parties stand ready to provide it.

Thank you for your consideration.

Respectfully submitted, /s/
Sylvie Levine
Attorney for Mr. Rumph 212-417-8729

The entire application is **GRANTED**. The sentencing is adjourned to 4/17/25 at 2:00 p.m. So Ordered.

Andra 7 Cat 2/1/25